

4A  
WA 2917

6/1/1988

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EXHIBIT IV-1

GENERAL SITE INSPECTION INFORMATION FORM

A. Site Name Burlington Environmental (Pier 91) B. Street (or other identifier) 2001 W Garfield  
C. City Seattle D. State Washington E. Zip Code 98119 F. County Name King

G. Site Operator Information

1. Name Burlington Environmental 2. Telephone Number (206) 223-0500  
3. Street \_\_\_\_\_ 4. City Seattle 5. State Wa. 6. Zip Code 98119

H. Site Description

I. Type of Ownership

   1. Federal    2. State    3. County    X 4. Municipal    5. Private

J.

X 1. Generator    2. Transporter X 3. Treatment X 4. Storage    5. Disposal

K. Regulatory Status

X 1. Interim Status X 3. Part B Permit Application Submitted  
   2. Permitted Facility    4. Part B Permit Application in Preparation

L.

1. Principal Inspector Name Jack Boller 3. Organization EPA R10/W00  
2. Title EPS 4. Telephone No. (area code and No.) (206) 753-9428

M. Inspection Participants

1. <u>Josh Chaitin Ecology</u>	6. _____
2. <u>Jeannie Summerhays Ecology</u>	7. _____
3. _____	8. _____
4. _____	9. _____
5. _____	10. _____



EXHIBIT IV-2

GENERAL FACILITY CHECKLIST

Section A - General Facility Standards

1. Does facility have EPA Identification No.? ☒ Yes ☐ No
- a. If yes, EPA I.D. No. WAP000812917  
If no, explain. \_\_\_\_\_
2. Has facility received hazardous waste from a foreign source? ☒ Yes ☐ No
- a. If yes, has it filed a notice with the Regional Administrator? ☒ Yes ☐ No

Waste Analysis

3. Does facility maintain a copy of the waste analysis plan at the facility? ☒ Yes ☐ No
- a. If yes, does it include:
1. Parameters for which each waste will be analyzed? ☒ Yes ☐ No
  2. Test methods used to test for these parameters? ☒ Yes ☐ No
  3. Sampling method used to obtain sample? ☒ Yes ☐ No
  4. Frequency with which the initial analyses will be reviewed or repeated? ☒ Yes ☐ No
  5. (For offsite facilities) waste analyses that generators have agreed to supply? ☒ Yes ☐ No
  6. (For offsite facilities) procedures which are used to inspect and analyze each movement of hazardous waste, including:
    - a. Procedures to be used to determine the identity of each movement of waste. ☒ Yes ☐ No
    - b. Sampling method to be used to obtain representative sample of the waste to be identified. ☒ Yes ☐ No
4. Does the facility provide adequate security through:
- a. 24-hour surveillance system (e.g., television monitoring or guards)? ☒ Yes ☐ No

OR

(continued)



EXHIBIT IV-2 (continued)

- b. 1. Artificial or natural barrier around facility ☒ Yes ☐ No  
(e.g., fence or fence and cliff)?

Describe \_\_\_\_\_

AND

2. Means to control entry through entrances (e.g., attendant, television monitors, locked entrance, controlled roadway access)? ☒ Yes ☐ No

Describe \_\_\_\_\_

General Inspection Requirements

5. Does the owner/operator maintain a written schedule at the facility for inspecting:

- a. Monitoring equipment? ☒ Yes ☐ No  
b. Safety and emergency equipment? ☒ Yes ☐ No  
c. Security devices: ☒ Yes ☐ No  
d. Operating and structural equipment? ☒ Yes ☐ No  
e. Types of problems of equipment:

1. Malfunction ☒ Yes ☐ No  
2. Operator error ☒ Yes ☐ No  
3. Discharges ☒ Yes ☐ No

6. Does the owner/operator maintain an inspection log? ☒ Yes ☐ No

- a. If yes, does it include:

1. Date and time of inspection? ☒ Yes ☐ No  
2. Name of inspector? ☒ Yes ☐ No  
3. Notation of observations? ☒ Yes ☐ No  
4. Date and nature of repairs or remedial action? ☒ Yes ☐ No

- b. Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet.) ☒ Yes ☐ No

Personnel Training

7. Does the owner/operator maintain personnel training records at the facility? ☒ Yes ☐ No

(continued)

EXHIBIT IV-2 (continued)

How long are they kept? for term of employment

a. If yes, do they include:

1. Job title and written job description of each position? ☒ Yes ☐ No
2. Description of type and amount of training? ☒ Yes ☐ No
3. Records of training given to facility personnel? ☒ Yes ☐ No

Requirements for Ignitable, Reactive, or Incompatible Waste

8. Does facility handle ignitable or reactive wastes? ☒ Yes ☒ No

a. If yes, is waste separated and confined from sources of ignition or reaction (open flames, smoking, cutting and welding, hot surfaces, frictional heat), sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat?

1. If yes, use narrative explanation sheet to describe separation and confinement procedures.
2. If no, use narrative explanation sheet to describe sources of ignition or reaction.

b. Are smoking and open flame confined to specifically designated locations? ☒ Yes ☐ No

c. Are "No Smoking" signs posted in hazardous areas? ☒ Yes ☐ No

d. Are precautions documented (Part 264 only)? ☒ Yes ☐ No

9. Check containers

a. Are containers leaking or corroding? ☐ Yes ☒ No

b. Is there evidence of heat generation from incompatible wastes? ☐ Yes ☒ No

Section B - Preparedness and Prevention

1. Is there evidence of fire, explosion, or contamination of the environment? ☐ Yes ☒ No

If yes, use narrative explanation sheet to explain.

(continued)



EXHIBIT IV-2 (continued)

2. Is the facility equipped with:
- a. Internal communication or alarm system? ☒ Yes ☐ No
    - 1. Is it easily accessible in case of emergency? ☒ Yes ☐ No
  - b. Telephone or two-way radio to call emergency response personnel? ☒ Yes ☐ No
  - c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? ☒ Yes ☐ No
  - d. Water of adequate volume for hoses, sprinklers, or water spray system? ☒ Yes ☐ No
    - 1. Describe source of water Seattle
3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? ☒ Yes ☐ No
4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) ☒ Yes ☐ No
5. In the case that more than one police or fire department might respond, is there a designated primary authority? ☒ Yes ☐ No
- a. If yes, name primary authority \_\_\_\_\_
6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors, and equipment suppliers? ☒ Yes ☐ No
- a. Are they readily available to all personnel? ☒ Yes ☐ No
7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? ☒ Yes ☐ No
8. If State or local authorities decline to enter, is this entered in the operating record? ☒ Yes ☐ No

(continued)

EXHIBIT IV-2 (continued)

Section C - Contingency Plan and Emergency Procedures

1. Is a contingency plan maintained at the facility? ☒ Yes ☐ No
  - a. If yes, is it a revised SPCC Plan? ☒ Yes ☐ No
  - b. Does contingency plan include:
    1. Arrangements with local emergency response organizations? ☒ Yes ☐ No
    2. Emergency coordinators' names, phone numbers, and addresses? ☒ Yes ☐ No
    3. List of all emergency equipment at facility and descriptions of equipment? ☒ Yes ☐ No
    4. Evacuation plan for facility personnel? ☒ Yes ☐ No
2. Is there an emergency coordinator on site or on call at all times? ☒ Yes ☐ No

Section D - Manifest System, Recordkeeping, and Reporting

1. Does facility receive waste from offsite? ☒ Yes ☐ No
  - a. If yes, does the owner/operator retain copies of all manifests?
    1. Are the manifests signed and dated and returned to the generator? ☒ Yes ☐ No
    2. Is a signed copy given to the transporter? ☒ Yes ☐ No
2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? ☒ Yes ☐ No
  - a. If yes, is it accompanied by a shipping paper?
    1. Does the owner/operator sign and date the shipping paper and return a copy to the generator? ☒ Yes ☐ No
    2. Is a signed copy given to the transporter? ☒ Yes ☐ No
3. Has the owner/operator received any shipments of waste that were inconsistent with the manifest (manifest discrepancies)? ☐ Yes ☒ No
  - a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter? ☐ Yes ☒ No
    1. If no, has Regional Administrator been notified? ☐ Yes ☒ No

(continued)



EXHIBIT IV-2 (continued)

4. Does the owner/operator keep a written operating record at the facility? ☒ Yes ☐ No
- a. If yes, does it include:
1. Description and quantity of each hazardous waste received? ☒ Yes ☐ No
  2. Methods and dates of treatment, storage, and disposal? ☒ Yes ☐ No
  3. Location and quantity of each hazardous waste at each location? ☒ Yes ☐ No
  4. Cross-references to manifests/shipping papers? ☒ Yes ☐ No
  5. Records and results of waste analyses? ☒ Yes ☐ No
  6. Report of incidents involving implementation of the contingency plan? ☒ Yes ☐ No
  7. Records and results of required inspections? ☒ Yes ☐ No
  8. Monitoring or testing analytical data (Part 264)? ☒ Yes ☐ No
  9. Closure cost estimates and, for disposal facilities, post-closure cost estimates (Part 264)? ☒ Yes ☐ No
  10. Notices of generators as specified in §264.12(b) (Part 264)? ☒ Yes ☐ No
5. Does the facility submit a biennial report by March 1 every even-numbered year? ☒ Yes ☐ No
- a. If yes, do reports contain the following information:
1. EPA I.D. number? ☒ Yes ☐ No
  2. Date and year covered by report? ☒ Yes ☐ No
  3. Description/quantity of hazardous waste? ☒ Yes ☐ No
  4. Treatment, storage, and disposal methods? ☒ Yes ☐ No
  5. Monitoring data under §265.94(a)(2) and (b)(2) (Part 265)? ☒ Yes ☐ No
  6. Most recent closure and post-closure cost estimates? ☒ Yes ☐ No
  7. For TSD generators, description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year? ☒ Yes ☐ No
  8. Certification signed by owner/operator? ☒ Yes ☐ No
6. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? ☒ Yes ☒ No
- a. If yes, has he submitted an unmanifested waste report to the Regional Administrator? ☒ Yes ☐ No
7. Does the facility submit to the Regional Administrator reports on releases, fires, and explosions; contamination and monitoring data; and facility closure? ☒ Yes ☐ No

EXHIBIT IV-3

LAND DISPOSAL RESTRICTIONS CHECKLIST\*

1. Are hazardous wastes land-disposed on site? ("Land disposal" includes placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, salt dome formation, salt bed formation, underground mine or cave, concrete vault, or bunker intended for disposal purposes; and placement in or on the land by means of open detonation and open burning where residues continue to exhibit hazardous characteristics).  
\_\_\_Yes ☒No
- a. If yes, are one or more of the following circumstances true:
  1. Granted extension from effective date pursuant to §268.5? \_\_\_Yes ☒No
  2. Granted exemption from a prohibition pursuant to a petition under §268.6? \_\_\_Yes ☒No
  3. Disposing of soil or debris resulting from a CERCLA response action or a RCRA corrective action, which will not be prohibited until November 8, 1988? \_\_\_Yes ☒No
  4. Facility is a small quantity generator of less than 100 kg of hazardous waste per month? \_\_\_Yes ☒No
2. Are restricted wastes or residuals from treatment of a restricted waste diluted in any way prior to disposal? \_\_\_Yes ☒No
3. Are there active surface impoundments used for treatment of hazardous wastes? \_\_\_Yes ☒No
- a. If yes, does the unit's design and operation meet the requirements set forth in §268.4? \_\_\_Yes ☒No
4. Has the facility sought exemption from any prohibition under Subpart C of §268 for the disposal of a restricted hazardous waste? \_\_\_Yes ☒No
- a. If yes, has the facility's demonstration included the required components (waste I.D., waste analysis, comprehensive environmental characterization of unit site, QA/QC plan, sampling, testing, modeling)? \_\_\_Yes ☒No
5. Has the facility determined whether it generates a restricted waste through waste analysis? ☒Yes \_\_\_No
- a. If yes, is the facility, in fact, handling a restricted waste(s)? ☒Yes \_\_\_No

(continued)



# EXHIBIT IV-3 (continued)

- b. If yes, does the restricted waste require treatment? ☒ Yes ☐ No
- c. If yes, has the generator notified the treatment facility in writing, and does the notification include all required components ([PA hazardous waste number, corresponding treatment standard, manifest number of shipment])? ☒ Yes ☐ No
6. Does the facility handle EPA Hazardous Waste Nos. F001 through F005 (solvent wastes)? ☐ Yes ☒ No
- a. If yes, do any of the following conditions apply:
1. The generator of the solvent waste is a small quantity generator (not more than 1000 kg/month)? ☐ Yes ☒ No
  2. The solvent waste is generated from a CERCLA response corrective action? ☐ Yes ☒ No
  3. The solvent waste is a solvent-water mixture, solvent containing sludge, or Solvent-contaminated soil (non-CERCLA or RCRA corrective action) containing less than 1 percent total F001 through F005 solvent constituents. ☐ Yes ☒ No
- b. If no, have any of these restricted wastes been land-disposed (except in an injection well) since November 8, 1986? ☐ Yes ☒ No
7. Does the facility handle EPA Hazardous Waste Nos. F020, F021, F023, F026, F027, or F028 (dioxincontaining wastes)? ☐ Yes ☒ No
- a. If yes, do any of the following conditions apply:
1. Wastes are treated to meet standards of Subpart D of §268? ☐ Yes ☒ No
  2. Wastes are disposed of at a facility that has been granted a petition? ☐ Yes ☒ No
  3. An extension has been granted? ☐ Yes ☒ No
- b. If no, will these restricted wastes be land disposed after November 8, 1988? ☐ Yes ☒ No
8. Are restricted wastes being treated? ☒ Yes ☐ No
- a. If yes, have any of their associated hazardous constituents exceeded the "Constituent in Waste Extract" (CWE) levels? ☐ Yes ☒ No

\*See OSWER Dir. No. 9938.1A (LDR Inspection Manual) for more detailed guidance!

EXHIBIT IV-4

GENERATOR'S CHECKLIST

Section A - EPA Identification No.

1. Does generator have EPA I.D. No? ☒ Yes ☐ No
- a. If yes, EPA I.D. No. WAD000812917

Section B - Manifest

1. Does generator ship waste offsite? ☒ Yes ☐ No
- a. If no, do not fill out Sections B and D.
- b. If yes, identify primary offsite facility(s). Use narrative explanation sheet.
2. Does generator use manifest? ☒ Yes ☐ No
- a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month)? ☒ Yes ☒ No
1. If yes, does generator indicate this when sending waste to a TSD facility? ☒ Yes ☐ No
- b. If yes, does manifest include the following information?
1. Manifest document No. ☒ Yes ☐ No
2. Generator's name, mailing address, telephone No. ☒ Yes ☐ No
3. Generator EPA I.D. No. ☒ Yes ☐ No
4. Transporter Name(s) and EPA I.D. No.(s) ☒ Yes ☐ No
5. a. Facility name, address, and EPA I.D. No. ☒ Yes ☐ No
- b. Alternate facility name, address, and EPA I.D. No. ☒ Yes ☐ No
- c. Instructions to return to generator if undeliverable ☒ Yes ☐ No
6. Waste information required by DOE - shipping name, quantity (weight or vol.), containers (type and number) ☒ Yes ☐ No

(continued)



EXHIBIT IV-4 (continued)

7. Emergency information (optional)  
(special handling instructions, telephone No.) ☒ Yes ☐ No

8. Is the following certification on each manifest form? ☒ Yes ☐ No

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

9. Does generator retain copies of manifests? ☒ Yes ☐ No

If yes, complete a through e.

- a. 1. Did generator sign and date all manifests? ☒ Yes ☐ No  
2. Who signed for generator?

Name \_\_\_\_\_ Title \_\_\_\_\_

- b. 1. Did generator obtain handwritten signature and date of acceptance from initial transporter? ☒ Yes ☐ No  
2. Who signed and dated for transporter?

Name \_\_\_\_\_ Title \_\_\_\_\_

- c. Does generator retain one copy of manifest signed by generator and transporter? ☒ Yes ☐ No

- d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? ☒ Yes ☐ No

- e. Does generator retain copies for 3 years? ☒ Yes ☐ No

Section C - Hazardous Waste Determination

1. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)? ☒ Yes ☐ No

- a. If yes, list waste and quantities \_\_\_\_\_  
(include EPA Hazardous Waste No.)

(continued)

EXHIBIT IV-4 (continued)

2. Does generator generate solid waste(s) listed in Subpart C that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) ☒ Yes ☐ No
- a. If yes, list wastes and quantities (include EPA Hazardous Waste No.) \_\_\_\_\_
- b. Does generator determine characteristics by testing or by applying knowledge of processes? both
1. If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)? ☒ Yes ☐ No
- a. If equivalent test methods used, attach copy of equivalent methods used.
3. Are there any other solid wastes generated by generators? ☒ Yes ☐ No
- a. If yes, did generator test all wastes to determine nonhazardous characteristics? ☒ Yes ☐ No
1. If no, list wastes and quantities deemed nonhazardous or processes from which nonhazardous waste was produced (use additional sheet if necessary).
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

Section D - Pretransport Requirements

1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? ☒ Yes ☐ No
2. a. Are containers to be shipped leaking or corroding? ☒ Yes ☒ No
- b. Use sheet to describe containers and condition.
- c. Is there evidence of heat generation from incompatible wastes in the containers? ☐ Yes ☒ No
3. Does generator follow DOT labeling requirements in accordance with 49 CFR 172? ☒ Yes ☐ No
4. Does generator mark each package in accordance with 49 CFR 172? ☒ Yes ☐ No
- (continued)



EXHIBIT IV-4 (continued)

5. Is each container of 110 gallons or less marked with the following label? ☒ Yes ☐ No

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator name(s) and address(es) \_\_\_\_\_

Manifest document No. \_\_\_\_\_

6. Does generator have placards to offer to transporters? ☒ Yes ☐ No

7. Accumulation time

- a. Are containers used to temporarily store waste before transport? ☒ Yes ☐ No

1. If yes, is each container clearly dated: Also, fill out rest of No. 7 (accum. time) ☒ Yes ☐ No

- b. 1. Does generator inspect containers for leakage or corrosion? (265.174 - Inspections) ☒ Yes ☐ No

2. If yes, with what frequency? weekly

- c. Does generator locate containers holding ignitable or reactive waste at least 15 meters (50 feet) from the facility's property line? (265.176 - Special Requirements for Ignitable or Reactive Wastes) ☒ Yes ☐ No

NOTE: If tanks are used, fill out checklist for tanks.

- d. Are the containers labeled and marked in accordance with Section D-3, -4, and -5 of this form? ☒ Yes ☐ No

NOTE: If generator accumulates waste on site, fill out checklist for General Facilities, Subparts C and D.

- e. Does generator comply with requirements for personnel training? (Attach checklist for 265.16 - Personnel Training.) ☒ Yes ☐ No

8. Describe storage area. Use photos and narrative explanation sheet.

EXHIBIT IV-4 (continued)

Section E - Recordkeeping and Records

1. Does generator keep the following reports for 3 years?

- |   |   |                             |
|---|---|-----------------------------|
| a. Manifests and signed copies from designated facilities | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| b. Annual reports   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| c. Exception reports                                      | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| d. Test results   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

2. Where are the records kept (at facility or elsewhere)? \_\_\_\_\_

3. Who is in charge of keeping the records?

Name \_\_\_\_\_ Title \_\_\_\_\_

Section F - Special Conditions

1. Has generator received from or transported to a foreign source any hazardous waste? ☒ Yes ☐ No
- a. If yes, has he filed a notice with the Regional Administrator? ☒ Yes ☐ No
- b. Is this waste manifested and signed by a foreign cosignee? ☒ Yes ☐ No
- c. If generator transported wastes out of the country, has he received confirmation of delivered shipment? ☒ Yes ☐ No



EXHIBIT IV-6

CONTAINERS CHECKLIST

Section A - Use and Management

1. Are containers in good condition? ☒ Yes ☐ No

Section B - Compatibility of Waste With Container

1. Is container made of a material that will not react with the waste which it stores? ☒ Yes ☐ No

Section C - Management of Containers

1. Is container always closed while holding hazardous waste? ☒ Yes ☐ No
2. Is container handled so that it will not be opened, handled, or stored in a manner which may rupture it or cause it to leak? ☒ Yes ☐ No

Section D - Inspections

1. Does owner/operator inspect containers at least weekly for leaks and deterioration? ☒ Yes ☐ No

Section E - Containment (Part 264)

1. Do container storage areas have a containment system? ☒ Yes ☐ No

Section F - Ignitable and Reactive Waste

1. Are containers holding ignitable and reactive waste located at least 15 m (50 ft) from facility property lines? ☒ Yes ☐ No

Section G - Incompatible Waste

1. Are incompatible wastes or materials placed in the same containers? ☐ Yes ☒ No
2. Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste? ☒ Yes ☐ No

(continued)

EXHIBIT IV-6 (continued)

3. Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device? ~~Yes~~ No

Section H - Closure (Part 264)

1. At closure, were all hazardous wastes and associated residues removed from the containment system? ~~Yes~~ No